

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

USDC SDNY
DOCUMENT
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DATE FILED: *3/3/08 (W)*

PUBLIC EMPLOYEES' RETIREMENT
ASSOCIATION OF COLORADO, TENNESSEE
CONSOLIDATED RETIREMENT SYSTEM,
SJUNDE AP-FONDEN, FJÄRDE AP-FONDEN,
PENSIONSKASSERNES ADMINISTRATION A/S,
Individually and On Behalf of All Others Similarly
Situated,

Plaintiffs,

v.

CITIGROUP INC., CHARLES O. PRINCE, SALLIE L.
KRAWCHECK, GARY L. CRITTENDEN, TODD S.
THOMSON, ROBERT DRUSKIN, THOMAS G.
MAHERAS, MICHAEL STUART KLEIN, DAVID C.
BUSHNELL, JOHN C. GERSPACH, STEPHEN R.
VOLK, GEORGE DAVID and KPMG LLP,

Defendants.

ECF Case

No. 08-CV-0135 (SHS)

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER**

Plaintiffs Public Employees' Retirement Association of Colorado, Tennessee
Consolidated Retirement System, Sjunde AP-Fonden, Fjärde AP-Fonden, and Pensionskassernes
Administration A/S and Defendants Citigroup Inc., Charles O. Prince, Sallie L. Krawcheck, Gary
L. Crittenden, Todd S. Thomson, Robert Druskin, Thomas G. Maher, Michael Stuart Klein,
David C. Bushnell, John C. Gerspach, Stephen R. Volk, George David, and KPMG LLP
stipulate as follows:

1. At Defendants' request, the parties have agreed that Defendants' time to respond
to (a) Plaintiffs' Motion to Require Related Parties to Preserve Documents and Other Evidence
(the "Document Preservation Motion") and (b) Plaintiffs' Motion for an Order Partially Lifting
the Private Securities Litigation Reform Act Discovery Stay (the "Discovery Stay Motion") shall

be adjourned pending the resolution of Plaintiffs' Motion for Consolidation, Appointment as Lead Plaintiff, and Approval of Co-Lead Counsel (the "Lead Plaintiff Motion").

2. Immediately following the resolution of the Lead Plaintiff Motion, the parties will confer in good faith on a schedule for the filing of any responses and replies on the Document Preservation Motion and the Discovery Stay Motion.

3. This Stipulation and [Proposed] Order supersedes only paragraphs 3 and 4 of the Stipulation entered by the parties on January 28, 2008. The other terms of that January 28 Stipulation continue to constitute an agreement among the parties.

Dated: New York, New York
February 22, 2008

By:


Andrew J. Entwistle (AE-6513)
Johnston de F. Whitman, Jr. (JW-5781)
Richard W. Gonnello (RG-7098)
Jonathan H. Beemer (JB-0458)
ENTWISTLE & CAPPUCCI LLP
280 Park Avenue
26th Floor West
New York, New York 10017
Telephone: (212) 894-7200

Andrew L. Barroway, Esq.
David Kessler, Esq.
Darren J. Check, Esq.
Sean M. Handler, Esq.
SCHIFFRIN BARROWAY TOPAZ
& KESSLER LLP
280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706

Attorneys for Plaintiffs Public Employees'
Retirement Association of Colorado,
Tennessee Consolidated Retirement System,
Sjunde AP-Fonden, Fjärde AP-Fonden, and
Pensionskassernes Administration A/S

By:



Lawrence B. Redowitz (LP-9718)
George T. Conway III (GC-3181)
Jonathan M. Moses (JM-9049)
John F. Lynch (JL-6661)
WACHTELL, LIPTON, ROSEN & KATZ
51 West 52nd Street
New York, New York 10019
Telephone: (212) 403-1000

Attorneys for Defendants Citigroup Inc.
and George David

By:

Susanna M Buergel / JPC

Brad S. Karp (BK-3702)
Susanna M. Buergel (SB-5394)
**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**
1285 Avenue of the Americas
New York, New York 10019
Telephone: (212) 373-3000

Attorneys for Defendants Citigroup Inc.,
Charles O. Prince, Sallie L. Krawcheck,
Gary L. Crittenden, Todd S. Thomson,
Robert Druskin, Thomas G. Maheras,
Michael Stuart Klein, David C. Bushnell,
John C. Gerspach, and Stephen R. Volk

By:

Robert A. Scher /sac

Peter N. Wang (PW-9216)
Robert A. Scher (RS-2910)
Sandra A. Chiocchi (SC-0368)
FOLEY & LARDNER LLP
90 Park Avenue
New York, New York 10016
Telephone: (212) 687-7474

Attorneys for Defendant KPMG LLP

SO ORDERED: 2/27/08

Hon. Sidney H. Stein, U.S.D.J.